

# EXHIBIT A

**From:** Gabriel Soledad

**Sent:** Tuesday, August 22, 2023 2:49 PM

**To:** Carlos Sires <[csires@bsfllp.com](mailto:csires@bsfllp.com)>; Ward, Daniel V. <[Daniel.Ward@ropesgray.com](mailto:Daniel.Ward@ropesgray.com)>

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**Subject:** RE: Correspondence re discovery responses

Carlos: As promised, I write in response to your August 18 letter.

As to Requests for Production Nos. 33–36, we do not believe that the parties are in disagreement. For the avoidance of doubt, we are not limiting our production to documents only found in custodial files, and agree to produce any documents in AIC's possession, custody, control located after a reasonable, diligent search.

As to SF's Second Set of Interrogatories, Interrogatory Nos. 10 and 11 are both contention interrogatories. As stated in the authority provided in our objections and responses, such interrogatories do not require a response at the beginning of discovery. You do not address that authority in your letter. If you have any contrary authority, we would of course consider it.

If this does not satisfactorily address the points made in your letter and you would like to meet and confer on the above, we are happy to do so. Please just let us know.

Thanks, Gabe

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